

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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OTHIEL ROSA, JONAH SILVA,
and JESUS SANDOZ, on behalf of
themselves and all other similarly
situated,

Plaintiffs,

v.

Case No: 1:20-cv-03672-BMC

**OFFER OF JUDGMENT
PURSUANT TO RULE 68 OF THE
FEDERAL RULES OF CIVIL
PROCEDURE**

Veeru Dhillon; Jamaica Fuel Inc.; John Doe
Defendant No. 1; John Doe Defendant No. 2;
and John Doe Defendant Corporations #1-10,

Defendants.
-----X

TO: Mohammed Gangat, Esq.
LAW OFFICE OF MOHAMMED GANGAT
675 Third Avenue, Suite 1810
New York, NY 10017
mgangat@gangatpllc.com
moe@lawyerforworkers.com
718-669-0714

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Veeru Dhillon and Jamaica Fuel Inc. (collectively “Defendants”) hereby offer to allow judgment to be taken against them, joint and severally, by Plaintiffs OTHIEL ROSA, JONAH SILVA, and JESUS SANDOZ (collectively “Plaintiffs”) in the above-captioned action in the total sum of Fifty Eight Thousand Five Hundred Dollars and No Cents (\$58,500.00), inclusive of reasonable attorney’s fees, costs, expenses and prejudgment interests accrued to the date of this offer, in full and final settlement of all of Plaintiffs’ claims against Defendants arising out, alleged in, or related to, the facts and transactions alleged in the above-captioned action.

This judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiffs may have to damages, or any other form of relief, arising out of the alleged acts or

omissions of Defendants or any owner, employee, or agent, either past or present, of the Defendants, or in connection with the facts and circumstances that are the subject of this action.

This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by any of the Defendants, or any owner, employee, representative, or agent of any of the Defendants; nor is it an admission that Plaintiffs have suffered any damages.

Acceptance of this offer of judgment will act to release and discharge Defendants, their respective successors or assigns, as well as all past and present owners, employees, representatives, and agents of the Defendants from any and all claims that were or could have been alleged by Plaintiffs in the above-referenced action.

In order for Plaintiffs to accept this offer, Plaintiff must serve written notice of acceptance upon Defendants within fourteen (14) days after service of this Offer of Judgment. An offer not accepted within the specified period for acceptance will be deemed withdrawn.

Date: April 30, 2021
New York, New York

Sincerely,



Ge Qu, Esq.
Hang & Associates, PLLC
136-20 38th Avenue, Suite 10G
Flushing, New York 11354
(718) 353-8588
rqu@hanglaw.com
*Attorneys for Defendants Veeru Dhillon and
Jamaica Fuel Inc.*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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OTHIEL ROSA, JONAH SILVA,
and JESUS SANDOZ, on behalf of
themselves and all other similarly
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Case No: 1:20-cv-03672-BMC

CERTIFICATE OF SERVICE

Plaintiffs,

v.

Veeru Dhillon; Jamaica Fuel Inc.; John Doe
Defendant No. 1; John Doe Defendant No. 2;
and John Doe Defendant Corporations #1-10,

Defendants.
-----X

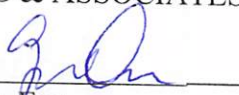
I, Ge Qu, an attorney duly admitted in this Court, hereby certifies:

I have today served the annexed OFFER OF JUDGMENT PURSUANT TO RULE 68
OF THE FEDERAL RULES OF CIVIL PROCEDURE on Plaintiffs, via U.S. Postal Service
mail, by depositing the same paper enclosed in postpaid wrappers, addressed to Plaintiffs'
counsel of record.

Mohammed Gangat
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New York, NY 10017
Tel: (718) 669-0714
Email: mgangat@gangatpllc.com

Dated: Flushing, New York
April 30, 2021

HANG & ASSOCIATES, PLLC

By: 
Ge Qu, Esq.

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*Attorneys for Defendants Veeru
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